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6 Attorneys for Plaintiffs

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10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 J.F., a minor, by and through her  
13 Guardian Ad Litem, LIZ FRANCO;  
14 V.F., a minor, by and through her  
Guardian Ad Litem, LIZ FRANCO;  
15 and M.M., a minor, by and through her  
Guardian Ad Litem, JENNIFER  
16 MENENDEZ,

17 Plaintiffs,

18  
19 vs.

20 CITY OF WOODLAKE; CHRIS  
21 KAIIOUS; JUAN GONZALES; and  
DOES 3 - 10, inclusive

22 Defendants.  
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Case No. 1:23-cv-01569-JLT-FRS (SKO)

*Hon. Jennifer L. Thurston*

**STIPULATION TO DISMISS  
ACTION WITH PREJUDICE**

[Proposed] Order *filed concurrently  
herewith*

1 IT IS HEREBY STIPULATED by and between the parties, by and through  
2 their respective attorneys of record, and pursuant to Federal Rules of Civil  
3 Procedure 41 (a)(2), that this Court enter a Dismissal of the entire action with  
4 prejudice. Parties shall bear their own costs and attorneys' fees.

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6 IT IS SO STIPULATED.

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8 DATED: January 5, 2026 LAW OFFICES OF DALE K. GALIPO

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10 By: /s/ Eric Valenzuela  
11 Eric Valenzuela  
12 Attorneys for Plaintiffs

13 DATED: January 5, 2026 LONGYEAR, LAVRA & CAHILL, LLP

14  
15 By /s/ Nicole M. Cahill  
16 Van Longyear  
17 Nicole M. Cahill  
18 Attorneys for Defendants  
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